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19 March 1999

Minerals Management Service
Attn: Rules Processing Team, MS 4024
381 Elden Street
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IN TRIPLICATE

Re: Update of Documents Incorporated by Reference
(RIN 1010-AC55)

Dear Rules Processing Team:

The International Association of Drilling Contractors supports, in principle, the proposal in today's *Federal Register* (64 FR 13535) to update the documents incorporated by reference by referencing the new edition of API RP 500 and adding API RP 505 as an alternative.

We remain concerned, however, about both the present structure of 30 CFR Part 250 and the proposed rewrite of Part 250 (63 FR 7335). As noted in our comments on the rewrite of Part 250, that proposed rule implies that API RP 500 is, by its incorporation by reference, the regulatory standard that must be met by mobile offshore drilling units (MODUs). However, both the current (16 December 1998) Memorandum of Understanding between MMS and the U.S. Coast Guard and its predecessor assigned responsibility for electrical hazardous area classification for MODUs to the Coast Guard. Unfortunately, MMS rules have not reflected this inter-agency agreement. This has resulted in both confusion and inappropriate attempts to enforce the API RP 500, rather than the Coast Guard's Electrical Engineering Regulations, on MODUs.

We hope that this source of confusion can be eliminated when the revised Part 250 is ultimately issued.

Sincerely,

Alan Spackman
Director, Offshore Technical
and Regulatory Affairs